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IDAHO PUBLIC
UTILITIES COMMISSION

RANDALL C. BUDGE
rcb@racinelaw.net

May 29, 2015

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
PO Box 83720
Boise, Idaho 83720-0074

Re: IPUC Case No. PAC-E-15-09

Dear Ms. Jewell:

Enclosed you will find the original and seven (7) copies of *Petition of Monsanto Company for Leave to Intervene*. Please file the same with the Commission's records. If you have any questions, please don't hesitate to call.

Thank you.

Sincerely,

RANDALL C. BUDGE

RCB:ts

cc: Service List

Randall C. Budge, ISB No. 1949
Thomas J. Budge, ISB No. 7465
RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
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rcb@racinelaw.net

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Attorneys for Intervenor Monsanto Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE
APPLICATION ROCKY MOUNTAIN
POWER TO MODIFY THE ENERGY
COST ADJUSTMENT MECHANISM AND
INCREASE RATES BY \$10.2 MILLION,
OR APPROXIMATELY 3.9 PERCENT**

Case No. PAC-E-15-09

**PETITION FOR MONSANTO
COMPANY FOR LEAVE TO
INTERVENE**

**PETITION OF MONSANTO COMPANY
FOR LEAVE TO INTERVENE**

COMES NOW Monsanto Company, herein called "this Intervenor" and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

- (1) The name and address of this Intervenor is:

Monsanto Company
c/o Steven D. Spinner, Manager, Energy Procurement
800 N. Lindburg Blvd., Mailzone C2NF
St. Louis, Missouri 63167

This Intervenor will be represented by:

Randall C. Budge
Thomas J. Budge
Racine, Olson, Nye, Budge & Bailey, Chartered
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

Randall C. Budge
Racine, Olson, Nye, Budge & Bailey, Chartered
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
Fax: (208) 232-6109
E-mail: rcb@racinelaw.net

Brubaker & Associates
16690 Swingley Ridge Rd., #140
Chesterfield, MO 63017
E-Mail: bcollins@consultbai.com

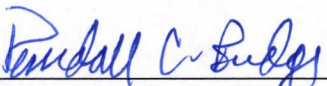
James R. Smith
Monsanto Company
P.O. Box 816
Soda Springs, Idaho 83276
Fax: 208-547-3312
E-Mail: jim.r.smith@monsanto.com

- (2) This Intervenor has a direct and substantial interest in this proceeding as a special contract customer of Applicant Rocky Mountain Power and intends to participate in all respects herein as a party as may be required to represent its interests.
- (3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this 29th day of May, 2015.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

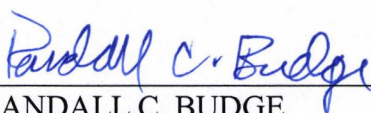
By: 
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 29th day of May, 2015, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary (original and 7) Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 jean.jewell@puc.idaho.gov	U.S. Mail + Email
Ted Weston Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, Utah 84111 ted.weston@pacificorp.com	Email
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RANDALL C. BUDGE